

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CUYLER BURK, P.C.

445 Park Avenue, 9th Floor
New York, New York 10022

Attorneys for Defendants

The Prudential Insurance Company of America,
and as to the First Cause of Action Only:

Rheem Manufacturing Company Long Term
Disability Plan, and Rheem Manufacturing Company

By: Stephen D. Cuyler (SDC 7705)

Received
7/20/07

GALINA WOODLAND

Plaintiff,

v.

RHEEM MANUFACTURING COMPANY
LONG TERM DISABILITY PLAN, RHEEM
MANUFACTURING COMPANY MEDICAL
PLAN, RHEEM MANUFACTURING
COMPANY, AND THE PRUDENTIAL
INSURANCE COMPANY OF AMERICA,

Defendant.

CIVIL ACTION NO. 07-CV-3210

**MOTION TO ADMIT COUNSEL PRO
HAC VICE**

FILED
U.S. DISTRICT COURT
2007 JUL 17 PM 2:39
S.D.N.Y.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, STEPHEN D. CUYLER, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicant's Name: Donna L. Schwartz
Firm Name: Cuyler Burk, P.C.
Address: 4 Century Drive
City/State/Zip: Parsippany, New Jersey 07054
Phone Number: (973) 734-3200
Fax Number: (973) 734-3201

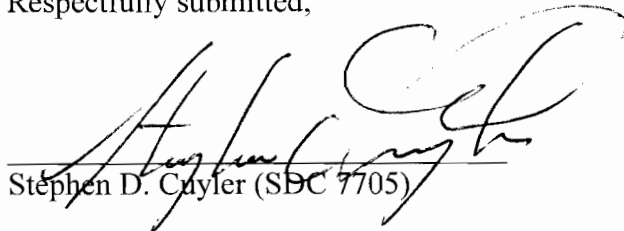
District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Donna L. Schwartz since 1999.
4. Donna L. Schwartz is a Shareholder at Cuyler Burk, P.C., in Parsippany, New Jersey.
5. I have found Donna L. Schwartz to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Donna L. Schwartz, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Donna L. Schwartz, pro hac vice, which is attached hereto as Exhibit A.

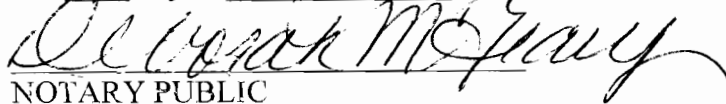
WHEREFORE it is respectfully requested that the motion to admit Donna L. Schwartz pro hac vice, to represent LTD Defendants in the above captioned matter, be granted.

Dated: June 27, 2007
City, State: Parsippany, New Jersey

Respectfully submitted,


Stephen D. Cuyler (SBC 7705)

Subscribed and sworn to before me, a Notary Public,
this 27th day of June 2007.


NOTARY PUBLIC

My commission expires:

DEBORAH McGEARY
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES MAY 10, 2010

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Plaintiff,

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LONG TERM DISABILITY PLAN, RHEEM
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CIVIL ACTION NO. 07-CV-3210

**AFFIDAVIT OF STEPHEN D.
CUYLER IN SUPPORT OF MOTION
TO ADMIT COUNSEL PRO HAC VICE**

State of New York)
)
County of New York) ss:

Stephen D. Cuyler, being duly sworn, hereby deposes and says as follows:

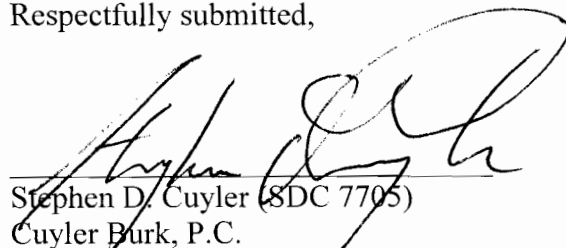
1. I am a Director at Cuyler Burk, P.C., counsel for Defendants The Prudential Insurance Company of America (as to all Causes of Action) as well as the Rheem Manufacturing Company Long Term Disability Plan and the Rheem Manufacturing Company (as to the First Cause of Action only) (collectively, the "LTD Plan Defendants") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of LTD Plan Defendants' motion to admit Donna L. Schwartz as counsel pro hac vice to represent LTD Plan Defendants in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law there on October 26, 2004. I am also admitted to the bar of the United States

DONNA L. SCHWARTZ is a member in good standing of the Bar of the State of New Jersey.

There are no pending disciplinary proceedings against DONNA L. SCHWARTZ in any State or Federal court.

Dated: June 27, 2007
City, State: Parsippany, New Jersey

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephen D. Cuyler", is written over a horizontal line.

Stephen D. Cuyler (SDC 7705)
Cuyler Burk, P.C.
445 Park Avenue, 9th Floor
New York, New York 10022
Phone Number: (212) 752-6252
Fax Number: (212) 752-6299

Supreme Court of New Jersey

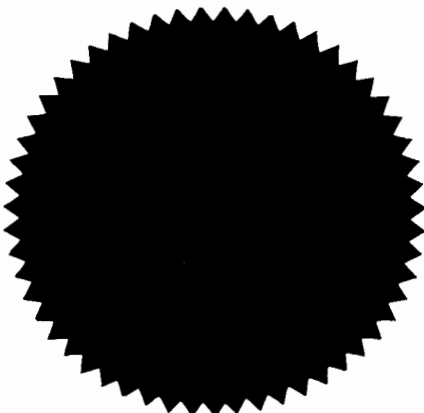


Certificate of Good Standing

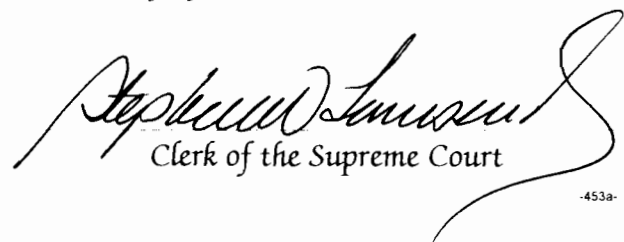
This is to certify that **DONNA LA VISTA SCHWARTZ**
(No. **034361991**) was constituted and appointed an Attorney at Law of New
Jersey on **December 19, 1991** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
5TH day of **July**, 20 **07**


Clerk of the Supreme Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CUYLER BURK, P.C.
445 Park Avenue, 9th Floor
New York, New York 10022
Attorneys for Defendants
The Prudential Insurance Company of America,
and as to the First Cause of Action Only:
Rheem Manufacturing Company Long Term
Disability Plan, and Rheem Manufacturing Company
By: Stephen D. Cuyler (SDC 7705)

GALINA WOODLAND

Plaintiff,

v.

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LONG TERM DISABILITY PLAN, RHEEM
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PLAN, RHEEM MANUFACTURING
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Defendant.

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AFFIDAVIT OF SERVICE

STATE OF NEW JERSEY)
 :ss:
COUNTY OF MORRIS)

Lucia Russo, being duly sworn, deposes and says:

1. I am employed by the law firm of Cuyler Burk, P.C. I am over the age of 18 years of age and I reside in New Jersey. I am not a party to this action.

2. On Wednesday, July 11, 2007, I caused true and correct copies of the Motion for Admission of Donna L. Schwartz to Practice *Pro Hac Vice*, Affidavit of Stephen D. Cuyler Support of the Motion to Admit Counsel to Practice *Pro Hac Vice*, Proposed Order of Admission of Donna L. Schwartz to Practice *Pro Hac Vice* and this Affidavit of Service to be served by Certified Mail

upon the persons listed on the annexed Exhibit A at the addresses set forth in such exhibit.

Lucia Russo
Lucia Russo

Sworn to me this 11th day of July, 2007

Michele Testa
Notary Public

MICHELE TESTA
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES FEB. 22, 2012

EXHIBIT A
SERVICE LIST

Stephane M. Montas
DeHaan Busse, LLP
300 Rabro Drive
Suite 301
Hauppauge, NY 11788

Paul A. Friedman
Epstein Becker & Green, P.C.
Two Gateway Center, 12th Floor
Newark, NJ 07102

Raymond T. Mak
Epstein Becker & Green, P.C.
250 Park Avenue
New York, NY 10177

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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LONG TERM DISABILITY PLAN, RHEEM
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COMPANY, AND THE PRUDENTIAL
INSURANCE COMPANY OF AMERICA,

Defendant.

CIVIL ACTION NO. 07-CV-3210

**ORDER FOR ADMISSION PRO HAC
VICE ON WRITTEN MOTION**

Upon the motion of Stephen D. Cuyler, attorney for Defendants The Prudential Insurance Company of America (as to all Causes of Action) as well as the Rheem Manufacturing Company Long Term Disability Plan and Rheem Manufacturing Company (as to the First Cause of Action only) (collectively, the "LTD Plan Defendants"), and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:	Donna L. Schwartz
Firm Name:	Cuyler Burk, P.C.
Address:	4 Century Drive
City/State/Zip:	Parsippany, New Jersey 07054
Phone Number:	(973) 734-3200
Fax Number:	(973) 734-3201
E-mail Address:	dschwartz@cuyler.com

is admitted to practice pro hac vice as counsel for LTD Defendants in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF)

system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

United States District/Magistrate Judge

FOR OFFICE USE ONLY: FEE PAID \$

SDNY RECEIPT#
